

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

## UNITED STATES DISTRICT COURT

for the

District of \_\_\_\_\_

Division \_\_\_\_\_

Jessica Dubuison

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Boston Medical Center

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☐ No

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Jessica Dubuison135 2nd aveWalthamMA 02451617-642-8028dubuisonjessica9@gmail.com

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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Defendant No. 1

Name  
Job or Title *(if known)*  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address *(if known)*

Boston medical Center  
one Boston Medical Center Pl  
Boston  
MA  
617-638-8000

Defendant No. 2

Name  
Job or Title *(if known)*  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address *(if known)*

Defendant No. 3

Name  
Job or Title *(if known)*  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address *(if known)*

Defendant No. 4

Name  
Job or Title *(if known)*  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address *(if known)*

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

~~subject~~ medical records falsifying

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) Jessica Dubuisson, is a citizen of the State of (name) Massachusetts.

**b. If the plaintiff is a corporation**

The plaintiff, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, (name) Boston Medical Center, is a citizen of the State of (name) Massachusetts. Or is a citizen of (foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Complaint (attached)

### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

falsification of medical records in the state of Massachusetts  
medical records are supposed to be accurate by law  
fine 250,000

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: February 10, 2021

Signature of Plaintiff

Printed Name of Plaintiff

Jessica Dubuison

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Jessica Dubuisson

Plaintiff

February 2, 2021

V

Boston Medical Center

Defendant

*Complaint for a Civil Case*

*Falsifying Medical Records*

Mason Dubuisson started going to Neurology at Boston Medical Center on April 14, 2019 his Neurologist was Doctor Lugo. Mason was given a Mri on July 13, 2019 and the results were given on August 15, 2019 with Doctor Lugo. Doctor Lugo said at the appointment that Mason had an early closure of one of the fissures provoking his cranium formed his shape of his skull. (will have that proof for the court proceedings) I picked up Mason Dubuisson medical records from Boston Medical Center and saw that Doctor Lugo diagnosed Mason with something that wasn't mentioned to me at the appointment for the results. On Mason Dubuisson medical records from Boston Medical Center, it mentioned he had skull lesions, most likely Begin Growths and Doctor Lugo didn't set up an appointment to figure out what type of skull lesions Mason actually has (will have that proof for the court proceeding). When I was finished reading Mason Dubuisson medical records from Boston medical Center, I requested his Mri cd imaging for the next Neurologist because I wanted to make sure Mason got the treatment he needed and that he was diagnosed accurately. When I received Mason cd imaging from Boston Medical Center there was a medical record in the package that had results and one of the results was that Mason Dubuisson didn't have skull lesions, but that wasn't on Mason medical records from Boston Medical Center. (will have that proof for the court proceedings) Mason Dubuisson has two sets of medical records from Boston Medical Center the same page numbers, but has something different on there. On Mason Dubuisson medical records from Boston Medical Center there is more than one page number with this issue for the two sets of medical records that I have (will have that proof for the court proceedings). I filed a case in Boston Superior Court on July 30, 2020 and had a court date with Boston Medical Center. Boston Medical Center did a Motion to Dismiss and the Judge granted their motion because the judge didn't think I had enough evidences and my compliant wasn't in plain statement. I'm asking to transfer my case to Federal Court because of the reasons I mentioned in my complaint.

The Plaintiff,

Jessica Dubuisson